## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ANDRE ROYAL,	)
Plaintiff,	)
v.	) No. 1:19-cv-516
NATIONAL FOOTBALL LEAGUE MANAGEMENT COUNCIL, et al.,	) ) )
Defendants.	) ) )

## DECLARATION OF MICHAEL L. JUNK IN SUPPORT OF THE BOARD DEFENDANTS' MOTION TO DISMISS

Pursuant to section 1746 of Title 28 of the United States Code, MICHAEL L. JUNK declares as follows:

- 1. I am of counsel with Groom Law Group, Chartered. I anticipate filing a motion for admission *pro hac vice* as counsel for Defendants, The Retirement Board of the Bert Bell/Pete Rozelle NFL Player Retirement Plan (the "Plan"), Katherine Blackburn, Richard Cass, Ted Phillips, Samuel McCullum, Robert Smith, and Jeffrey Van Note (collectively, the "Retirement Board") in the above-referenced matter.
  - 2. I submit this declaration in support of the Retirement Board's Motion to Dismiss.
- 3. Attached hereto as **Exhibit A** is a true and correct copy of the Bert Bell/Pete Rozelle NFL Player Retirement Plan, amended, restated, and merged as of September 1995.
- 4. Attached hereto as **Exhibit B** is a true and correct copy of the Summary Plan Description for the Bert Bell/Pete Rozelle NFL Player Retirement Plan, dated December 1999.
- 5. Attached hereto as **Exhibit C** is a true and correct copy of the Joint Resolution of the NFL Players Association and the NFL Management Council dated January 1999.

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- 6. Attached hereto as **Exhibit D** is a true and correct copy of a letter from Michael B. Miller to Andre Royal dated December 2, 2015.
- 7. Attached hereto as **Exhibit E** is a true and correct copy of the Bert Bell/Pete Rozelle NFL Player Retirement Plan, amended and restated as of April 1, 2009.
- 8. Attached hereto as **Exhibit F** is a true and correct copy of the Summary Plan Description for the Bert Bell/Pete Rozelle NFL Player Retirement Plan, dated August 2010.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 5, 2019

Michael L. Junk

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